



June 4, 2020

BY ECF

MEMORANDUM ENDORSED

Hon. Gregory H. Woods
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
Pearl Street, Room 2260
New York, NY 10007

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Re: Mark Owen v. Elastos Foundation, et al., 19-cv-05462-GHW

Dear Judge Woods,

We represent defendants in the above-referenced matter and write pursuant to Section 1(E) of the Court's Individual Rules of Practice to request a short extension of defendants' time to respond to the operative complaint (the "Complaint") and to propose a briefing schedule for defendants' anticipated motion to dismiss the Complaint.

On May 26, 2020, the Court issued an order appointing lead plaintiffs and lead counsel in this action, and set the deadline for defendants to answer or otherwise respond to the Complaint for June 16, 2020. We conferred with counsel for lead plaintiffs on May 29, 2020, at which time the parties agreed to propose to the Court the following briefing schedule for defendants' motion to dismiss:

June 24, 2020:	Defendants' motion to dismiss due
July 17, 2020:	Plaintiffs' memorandum in opposition due
August 3, 2020:	Defendants' reply due

The parties have not previously requested an extension of time or proposed a different briefing schedule in connection with this anticipated motion to dismiss.

We appreciate Your Honor's consideration of this request.

Respectfully submitted,

Kenneth P. Herzinger

Application denied in part and granted in part. The deadline for Defendants to answer or otherwise respond to the Complaint is extended to June 24, 2020. However, in accordance with Rule 2(C) of the Court's Individual Rules of Practice in Civil Cases, the Court will hold a pre-motion conference before Defendants may file a motion to dismiss. The conference will be held on June 19, 2020 at 12:00 p.m., at which time the Court will set a briefing schedule. Defendants must submit the letter described in Rule 2(C)(i) by June 12, 2020. Lead Plaintiffs' response, if any, is due by June 17, 2020. In accordance with the Court's Emergency Rules In Light of COVID-19, available on the Court's website, the pre-motion conference will be held via conference call. The parties are directed to use the conference call dial-in information and access code noted in the Emergency Rules.

SO ORDERED.

GREGORY H. WOODS
United States District Judge

Dated: June 9, 2020